

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

TIMOTHY CABE BOOTH,

Plaintiff,

v.

ANSCHUTZ ENTERTAINMENT GROUP, INC.;  
AEG LIVE LLC;  
ANSCHUTZ TEXAS LP; AEG PRESENTS, LLC;  
and ROBIN PHILLIPS,

Defendants.

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CIVIL ACTION NO.:

**A JURY IS DEMANDED**

**PLAINTIFF'S ORIGINAL COMPLAINT**

Plaintiff, Timothy Cabe Booth ("Cabe" or "Plaintiff") alleges as follows:

**PARTIES**

1. Plaintiff Cabe is a living individual and a Dallas County, Texas resident. Cabe is an artist and author of the body of works of visual art referred to in this Complaint as the Artworks. Cabe holds a BFA in painting and drawing from the University of North Texas School of Visual Arts.

2. Individual Defendant Robin Phillips ("Phillips") is a resident of Tarrant County, Texas; on information and belief, she is and has been at all material times a Vice President of AEG Presents, LLC and personally participated in, supervised, and directed the VARA violations alleged in this Complaint.

3. On information and belief, Defendant Anschutz Entertainment Group, Inc. is and has been at all material times a corporation doing business in Texas.

4. On information and belief, Defendant AEG Live, LLC has been at all material times a limited liability company doing business in Texas.

5. On information and belief, Defendant Anschutz Texas, LP is and has been at all material times a Texas limited partnership doing business in Dallas County, Texas.

6. On information and belief, Defendant AEG Presents, LLC (formerly known as AEG Live, LLC) is and has been at all material times a Delaware limited liability company registered to do business and doing business in Texas. AEG Presents is the second-largest presenter of live music and entertainment events, after Live Nation.

7. Defendants Anschutz Entertainment Group, Inc., AEG Live LLC, Anschutz Texas LP, and AEG Presents LC are referred to collectively herein as “AEG” or the “AEG Defendants”). The term “Defendants” when used by itself refers to all Defendants collectively.

8. On information and belief, the AEG Defendants operated at the time of the events complained of, the venue currently known as the “Texas Trust CU Theatre at Grand Prairie” (previously known as “The Verizon Theatre,” and before that as “Nokia Theatre” and “NextStage Performance Theater”) (“Theatre”). The Theatre is

owned by the City of Grand Prairie and leased by AEG from the City of Grand Prairie.

9. Cabe is informed and believes, and on that basis alleges, that at all relevant times mentioned in this Complaint, Defendants were acting in concert and actively participating with each other in committing the acts alleged herein, and were agents of each other and were acting within the scope and authority of that agency with knowledge, consent and approval of one another.

### **JURISDICTION AND VENUE**

10. This court has jurisdiction of the Visual Artists Rights Act (“VARA”) claims under 17 U.S.C. §106A and 28 U.S.C. § 1331 and 1338(a).

11. This Court has supplemental jurisdiction under 28 U.S.C. § 1367(a) over any claims not otherwise within federal jurisdiction because they form part of the same case or controversy as the VARA claims and arise from a common nucleus of operative fact.

12. Venue is proper in this Court under 28 U.S.C. § 1391 (b) and (c) because all Defendants are residents of this District for the purpose of determining venue and a substantial part of the events giving rise to the claims occurred in this District.

### **FACTUAL BACKGROUND**

13. This controversy arises because of Defendants’ intentional mutilation and/or destruction of hundreds of Plaintiff Cabe’s paintings of recognized quality and of

substantial public interest including by disposing of them in a dumpster. Defendants were also grossly negligent by failing to properly maintain and protect Cabe's paintings and disposing of them without first making a reasonable effort at restoration or to repair any damage. These acts were done without Cabe's prior knowledge or consent and in violation of the artist's rights under VARA.

**14.** Cabe is a well-recognized artist in the Dallas arts and entertainment community. In about 1997 Cabe began creating a body of artworks which achieved recognized stature and which ultimately included hundreds of hand painted portraits of performers and famous persons appearing at local Dallas area venues. Among some of the more famous individuals that are subjects of Cabe's performer portraits include: Gladys Knight, Ex-President Clinton, Willie Nelson, Bruce Springsteen, Bette Midler, David Copperfield, Duran Duran, Billy Idol, George Lopez, Bob Dylan, Merle Haggard, Dolly Parton, Tom Jones, Ringo Starr, Paul Simon, Al Gore, BB King, Sting, Robin Williams, George Jones, Patti LaBelle and others.

**15.** In about 1997, Cabe was initially commissioned to hand paint a large wooden 3x3 ft "performer portrait" to memorialize the opening of the Curtain Club in Dallas. The wooden medium allowed the painting to be mounted flush on the wall. This painting was so well received, that the single painting commission turned into regular painting commissions at the Curtain Club and other venues such as: The Palladium Ballroom, Trees Club, Theatre at Grand Prairie ("Theatre"), Pizza Hut



Park, and the Sprint Center in Kansas City, Missouri. AEG hired Cabe to paint performer portraits for the Palladium Ballroom (later known as the “South Side Ballroom”).

**16.** In about May 2002, Cabe continued to create performer portraits for the Curtain Club and other Dallas area venues. Managers of the Texas Trust CU Theatre at Grand Prairie” (then known as “NextStage”) approached Cabe to paint performer portraits and in May of that year Cabe began painting portraits for the Theatre. Cabe continued painting for the Theatre for 10 years until 2012, resulting in a substantial body of work, with hundreds of Cabe’s paintings being displayed on the walls of the Theatre.

**17.** Between 2002 and 2012, Cabe painted and delivered hundreds of performer portraits, which were placed on the walls of the Theatre. **Appendix A** contains a partial list of over 300 performer portrait paintings (Cabe’s Artworks) that Cabe sold to the Theatre and delivered to Defendants’ possession and care.

**18.** AEG manages the Theatre and describes the Theatre as a five-story concert and entertainment facility seating over 6,000. To see the Theatre at Grand Prairie’s promotions of the performer portraits, go to YouTube. See [https://youtu.be/KjNFm5\\_1YfQ](https://youtu.be/KjNFm5_1YfQ)? This video shows a tour of the Theatre conducted by AEG’s Director of Marketing; a number of Cabe’s paintings in the backstage area of the Theatre are shown, prominently displayed along the walls of the hallway that

all the performers come through to the dressing rooms, and also on the walls of the dining room used by the performers (and also some staff); Cabe's paintings are described as being "amazing" and "incredible" in the video.

19. Upon information and belief, an average over twenty-five thousand individuals attend events at the Theatre per month. To see Cabe's artworks on display at the Theatre, see <https://maps.app.goo.gl/kMAjs9HMgDLEsHSZ7>.

20. Cabe's performer portraits were prepared without the performer's presence, requiring the use of acceptable approved images of the performer. Cabe's performer portraits for the Theatre (including those listed in **Appendix A**) were based on images furnished to him by the Theatre (or AEG) including images sometimes called "admats," and constituted derivative works fully protected by VARA.

21. Cabe's performer portraits delivered to the Theatre contained Cabe's name and identifying logo, and were viewed and presented to the performer for autographing.

22. In creating the performer portraits for the Theatre (including those listed in **Appendix A**), Cabe was a 1099 independent contractor rather than an employee, and the paintings were not "works made for hire." Cabe retained the copyrights to his Artworks, and no copies thereof can be made without his prior consent.

23. Cabe delivered over three hundred (300) paintings to AEG's possession.

**24.** Cabe recently was informed that Defendants had mutilated and/or destroyed performer portraits he painted for the Theatre (artworks) and trashed and disposed of them in a dumpster.

**25.** AEG disposed of some of Cabe's artworks.

**26.** In a letter dated November 2, 2023, Defendants' counsel admitted to Defendants' disposing of "some" of Cabe's "artworks" without identifying which of Cabe's 300+ artworks were destroyed and disposed of. The letter also claimed: "AEG never destroyed Mr. Booth's artwork, it only disposed of damaged artwork that was already destroyed by a weather event having nothing to do with AEG and over which AEG had no control."

**27.** Defendants did not notify Cabe in advance of his artworks' disposal.

**28.** Defendants did not seek Cabe's permission before disposing of his artworks.

**29.** AEG disposed of some of Cabe's artworks in a dumpster.

**30.** AEG has no more than about one hundred twenty (120) of Cabe's paintings remaining in AEG's possession.

**31.** Defendants also stated in the November 2, 2023 letter that approximately 120 unidentified, undamaged artworks ("admat art boards") were still in Defendants' possession but failed to identify which of these comprised Cabe's paintings. In fact, Defendants' letter stated: "AEG is under no obligation to produce proof regarding any of Mr. Booth's artworks or to identify the location of those works."

**32.** On information and belief, Defendants intentionally mutilated and/or destroyed a number of Cabe's Artworks without giving Cabe prior notice and without obtaining his consent.

**33.** Upon information and belief Defendants were also grossly negligent by failing to maintain and safeguard Cabe's paintings and disposing of them without first making a reasonable effort at restoration or to repair any damage.

**34.** Defendants did not provide notice or any opportunity for Cabe to object or to protect or restore the paintings and took no steps to provide any notice of the destruction of the paintings.

**35.** On information and belief, Defendants' acts of mutilation and/or destruction (disposal) of Cabe's Artworks were intentional. In addition, Defendants were aware of their duty under VARA not to destroy artwork of this character. Defendants were on notice as to artists' legal right of integrity and its protection under VARA and still went ahead and destroyed and/or mutilated Cabe's artworks.

**36.** Defendants were well aware of the VARA statute prohibitions, as Defendants had previously been sued for destroying artworks under VARA. *See Ockerman v. Anschutz Entertainment Group, Inc.*, No. 2:11-cv-09422 (C.D. Cal. filed 11/14/2011) (AEG sued for dumping artworks in the trash; AEG settled the case before trial).

37. Notwithstanding the fact that AEG had settled the previous VARA suit for destroying artworks (paintings), AEG was undeterred from mutilating and/or destroying Cabe's paintings that had been on display and misleading about the destruction.

**CLAIM I: VIOLATION OF THE VISUAL ARTISTS RIGHTS ACT (17 U.S.C. §106A) – RIGHT OF INTEGRITY**

38. Cabe incorporates and realleges all previous allegations as if fully set forth herein.

39. Cabe's paintings are each works of visual art referred to in this Complaint as the Artworks. Cabe's paintings consisted of works of a recognized stature.

40. Defendants willfully and intentionally destroyed, distorted, mutilated, and/or otherwise modified Cabe's paintings.

41. Cabe did not give consent to Defendants to destroy or mutilate his Artworks. Cabe has not waived any of his rights granted under VARA, 17 U.S.C. §106A.

42. In destroying and mutilating Cabe's paintings, Defendants acted willfully, intentionally, and/or with gross negligence. Defendants' destruction of Cabe's paintings of recognized stature is the proximate cause of prejudice to Cabe's honor and reputation.

43. Defendants were grossly negligent by failing to maintain and safeguard Cabe's paintings and disposing of them without first making a reasonable effort at restoration or to repair any damage.

44. The destruction, distortion, mutilation, and/or modification of Cabe's Artworks occurred in a manner prejudicial to his honor and/or reputation and causing him substantial harm in this regard.

45. Cabe is entitled to compensatory (actual and/or statutory damages) for the injuries and loss sustained as a result of Defendants' conduct and any additional profits of Defendants not taken into account in computing actual damages.

46. Cabe is entitled to recover his reasonable attorney's fees and costs pursuant to 17 U.S.C. § 505.

47. Because Defendants acted willfully, pursuant to VARA and the Copyright Act, Cabe is entitled to, and seeks, penalties of up to \$150,000 for each of the hundreds of paintings destroyed under 17 U.S.C. § 504(c).

**CLAIM II: VIOLATION OF THE VISUAL ARTISTS RIGHTS ACT (17  
U.S.C. §106A) – RIGHT OF ATTRIBUTION**

48. Cabe incorporates and realleges all previous allegations as if fully set forth herein.

49. Under VARA, Cabe was entitled to receive credit for his authorship of his Artworks.

**50.** Plaintiff has not waived Cabe's rights under VARA.

**51.** Defendants violated Cabe's right of attribution under VARA by destroying and/or mutilating his Artworks and depriving him of the right to receive credit for his work.

**52.** Defendants' actions injured Cabe and his honor and reputation, and Defendants are liable to Cabe for actual or statutory damages, at his election, as well as attorneys' fees and costs, under 17 U.S.C. §§504(c), 505.

### **CLAIM III: NEGLIGENCE**

**53.** Cabe incorporates and realleges all previous allegations as if fully set forth herein.

**54.** Defendants owed a general duty to Cabe of ordinary and reasonable care, and an affirmative duty not to destroy or mutilate the Artworks.

**55.** Defendants breached that duty by destroying and/or mutilating Cabe's Artworks without Cabe's permission or consent.

**56.** Defendants were grossly negligent by failing to maintain and safeguard Cabe's paintings and disposing of them without first making a reasonable effort at restoration or to repair any damage.

**57.** As a direct and proximate result of Defendants' breach, Cabe has suffered damages in an amount according to proof at trial.

**PRAYER FOR RELIEF**

WHEREFORE, Cabe prays for Judgment as follows:

- a. A judgment in Cabe's favor and against Defendants on all of Cabe's claims against Defendants;
- b. For compensatory damages and any additional profits of Defendants not taken into account in computing actual damages;
- c. That Cabe receive statutory damages under 17 U.S.C § 504(c) for each violation of rights under VARA up to the maximum allowed by law, or actual damages, as well as attorneys' fees under 17 U.S.C. § 505;
- d. That the Court award Cabe his attorneys' fees, costs, and expert fees, as allowed by law;
- e. An award of prejudgment and post judgment interest, as provided by law;
- f. For preliminary and permanent injunctions protecting the 100+ Artworks still in Defendants' possession and restraining Defendants and their employees, agents, servants, attorneys, representatives, successors and assigns, and any and all persons in active concert or participation with any of them, from further damaging, mutilating or destroying Cabe's Artworks or engaging in any further violations of VARA;
- g. That the Court order Defendants to provide an accounting and proof regarding Cabe's Artworks and identify the location of these works; and



h. Such other and further relief to which Cabe may be justly entitled.

**JURY DEMAND**

Cabe respectfully demands trial by jury.

Dated this 25 day of January 2024.










Respectfully submitted,







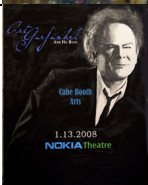


/s/ Peter V. Schroeder







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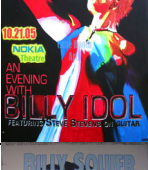

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BOOTH ALBANESI SCHROEDER, PLLC  
8117 Preston Road, Suite 300  
Dallas, TX 75225  
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Ref	Picture	Items/ Performers
1		311
2		12 Girls Band
3		3 Doors Down
4		A Perfect Circle
5		Aaron Lewis, Staind
6		Adam Savage, Jamie Hyneman
7		Aetheria, Willie Nelson
8		Al Gore
9		Al Green, Etta James, Delbert McClinton

Ref	Picture	Items/ Performers
10		Alejandro Fernandez
11		Alejandro Sanz
12		Alice In Chains
13		Alicia Keys
14		Alison Krauss, Union Station
15		American Idols
16		American Idols, Carrie Underwood
17		Andre Rieu
18		Andre Rieu, Johann Strauss Orchestra


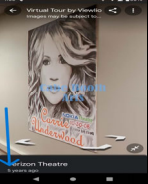
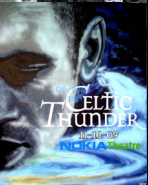




Ref	Picture	Items/ Performers
19		Angie Stone
20		Anita Baker
21		Anthony Hamilton
22		Anthony Hamilton
23		Aretha Franklin
24		Arnez J, Earthquake, Damon Wayans, Jr.
25		Art Garfunkel
26		Artie Lang
27		Ashlee Simpson

Ref	Picture	Items/ Performers
28	 A poster for Avenged Sevenfold's "Welcome to the Family" tour. It features the band members in a dark, gothic style with the text "welcome to the family" and "Avenged Sevenfold".	Avenged Sevenfold
29	 A poster for B2K's "Scream Tour III". It shows the four members of the group in white outfits against a black background with the text "SCREAM TOUR III" and "B2K".	B2K
30	 A poster for Backstreet Boys' "Up Close and Personal" tour. It features the five members of the group in white suits on a stage with the text "backstreet boys" and "UP CLOSE AND PERSONAL".	Backstreet Boys
31	 A poster for "Bad Boys of Comedy". It features three comedians in a black and white photo with the text "Bad Boys of Comedy" and "COMEDY".	Bad Boys of Comedy
32	 A poster for Bare Naked Ladies' "Automated Ladies Everywhere" tour. It shows the three members of the group in white outfits with the text "Automated Ladies Everywhere" and "Bare Naked Ladies".	Bare Naked Ladies
33	 A poster for Barney's "Let's Go Tour". It features the Barney the Dinosaur character and two other characters in a colorful, cartoonish style with the text "Barney's Let's Go Tour".	Barney Let's Go Tour
34	 A poster for Barney's "Colorful World". It features Barney the Dinosaur character and other characters in a colorful, cartoonish style with the text "Barney's Colorful World".	Barney's Colorful World
35	 A poster for BB King's "Black & Blue" tour. It features BB King in a black and white photo with the text "BB King" and "Black & Blue".	BB King
36	 A poster for BB King's "BB King" tour. It features BB King in a black and white photo with the text "BB KING" and "BB King".	BB King

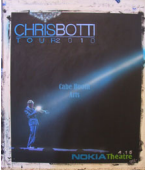
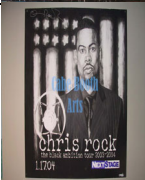

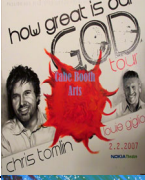
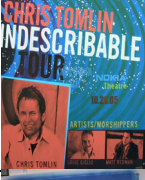




Ref	Picture	Items/ Performers
37		Beck
38		Bela Fleck and the Flecktones
39		Bell Biv DeVoe, Keith Sweat, Tony Toni Tone, Aaron Hall
40		Benise
41		Bette Midler
42		Bill Clinton
43		Bill O'Reilly
44		Billy Idol
45		Billy Squier

Ref	Picture	Items/ Performers
46	 A poster for the Blue Man Group, featuring a blue-skinned figure in a suit. Text includes "BLUE MAN GROUP", "AUG. 16-19", "4.00-13.00", and "2003".	Blue Man Group
47	 A poster for "THE BOB DYLAN SHOW" and "MERLE HAGGARD". Text includes "ALL NEW SHOW!", "HIGH GRADE - FUTURE PERFECT", "BOB DYLAN", "MERLE HAGGARD", and "12.06".	Bob Dylan, Merle Haggard
48	 A poster for the "LEGENDS TOUR" featuring Bobby Womack, The Manhattans, Bobby Blue Band, and Millie Jackson. Text includes "LEGENDS TOUR", "Bobby Womack", "The Manhattans", "Bobby Blue Band", and "Millie Jackson".	Bobby Womack, The Manhattans, Bobby Blue Band, Millie Jackson
49	 A poster for Bonnie Raitt, featuring her playing guitar. Text includes "BONNIE RAITT", "SOULS ALIKE", "SUMMER TOUR", and "NOKIA Theatre".	Bonnie Raitt, Keb' Mo'
50	 A poster for Boys Like Girls, featuring the band members. Text includes "BOYS LIKE GIRLS", "ALL-TIME LOW", "LIVE AT THE NOKIA THEATRE", and "NOKIA Theatre".	Boys Like Girls
51	 A poster for Brian Wilson, featuring a circular logo with "BRIAN WILSON" and "SMILE". Text includes "BRIAN WILSON", "SMILE", and "NOKIA Theatre".	Brian Wilson
52	 A poster for Bright Eyes and The Faint, featuring the band members. Text includes "BRIGHT EYES & THE FAINT", "W/ AIRBOEN AUDIO", and "NOKIA Theatre".	Bright Eyes, The Faint
53	 A poster for Bruce Springsteen, featuring a close-up of his face. Text includes "BRUCE SPRINGSTEEN", "DEVILS & DUST TOUR", "4.28.2005", and "NOKIA Theatre".	Bruce Springsteen
54	 A poster for Bruno Mars and Janelle Monae, featuring both artists. Text includes "BRUNO MARS", "JANELLE MONAÉ", and "NOKIA Theatre".	Bruno Mars, Janelle Monae

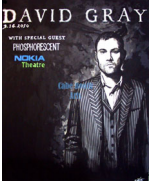





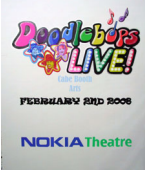




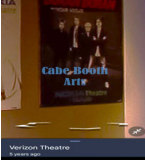
Ref	Picture	Items/ Performers
55		Carlos Mencia
56		Carrie Underwood
57		Cedric The Entertainer
58		Celtic Thunder
59		Celtic Woman
60		Celtic Woman
61		Celtic Woman
62		Celtic Woman
63		Charlie Brown and Friends, David Benoit, Al Jarreau, Melissa Manchester



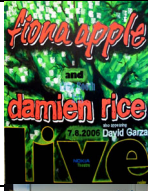




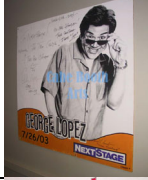



Ref	Picture	Items/ Performers
64		Chris Botti
65		Chris Rock
66		Chris Tomlin
67		Chris Tomlin, Louie Giglio
68		Chris Tomlin, Louie Giglio, Matt Redman
69		Cirque Dreams Jungle Fantasy
70		Counting Crows, Michael Franti & Spearhead
71		Crosby Stills Nash, David Crosby, Steven Stills, Graham Nash
72		Curious George







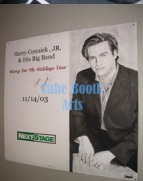


Ref	Picture	Items/ Performers
73		Daddy Yankee
74		Danzig
75		Daryl Hall, John Oats
76		Dashboard Confessional
77		Dave Koz
78		David Cassidy
79		David Copperfield
80		David Gray
81		David Gray

Ref	Picture	Items/ Performers
82		David Gray
83		Death Cab for Cutie
84		Death Cab for Cutie, Franz Ferdinand
85		Def Leppard
86		deftones
87		Demi Lovato
88		Denis Leary
89		Dennis Miller
90		Diana Ross


Ref	Picture	Items/ Performers
91		Disturbed
92		Dolly Parton
93		Dolly Parton
94		Doodlebops
95		Dora The Explorer
96		Dream Theater
97		Duran Duran
98		Duran Duran
99		Duran Duran

Ref	Picture	Items/ Performers
100		Dweezil Zappa, Frank Zappa
101		Earth Wind and Fire
102		Earth Wind and Fire
103		Elvis Costello
104		Elvis Costello
105		Evanescence
106		Fall Brawl
107		Fall Out Boy
108		Fall Out Boy

Ref	Picture	Items/ Performers
109		Fiona Apple, Damien Rice
110		Flight Of The Conchords
111		Gabriel Iglesias
112		Gallagher
113		Gallagher
114		George Lopez
115		George Lopez
116		George Lopez
117		George Lopez




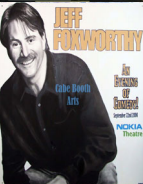


Ref	Picture	Items/ Performers
118	 A poster for Gipsy Kings featuring three men, one playing a guitar. The text includes "Gipsy Kings" and "May 16, 2007".	Gipsy Kings
119	 A poster for Gladys Knight featuring a black and white photo of her. The text includes "A Gipsy Kings Gladys Knight" and "March 8, 2007".	Gladys Knight
120	 A poster for Glenn Campbell featuring a black and white photo of him. The text includes "1-16-09", "NOKIA Theatre", and "Glenn Campbell".	Glen Campbell
121	 A colorful poster for "Go Diego Go Live!" featuring a cartoon character. The text includes "JULY 27TH-29TH 2007" and "NOKIA Theatre".	Go Diego
122	 A poster for Good Charlotte featuring a black and white photo of the band. The text includes "Good Charlotte" and "NOKIA Theatre".	Good Charlotte
123	 A poster for Gordon Lightfoot featuring a black and white photo of him. The text includes "GORDON LIGHTFOOT" and "NOKIA Theatre".	Gordon Lightfoot
124	 A poster for Harry Connick, Jr. featuring a black and white photo of him. The text includes "Harry Connick, Jr.", "The Harry Connick, Jr. Band", and "NOKIA Theatre".	Harry Connick , Jr.
125	 A poster for Harry Connick, Jr. featuring a black and white photo of him. The text includes "HARRY CONNICK, JR.", "My new solo tour", "SATURDAY MAY 12 2007", and "NOKIA Theatre".	Harry Connick , Jr.
126	 A poster for the band Heart featuring a black and white photo of the band. The text includes "Heart" and "9.22.2004".	Heart






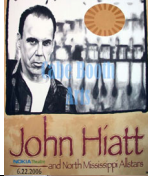


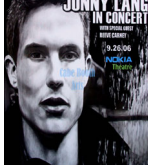


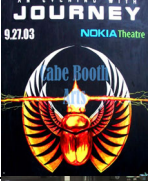


Ref	Picture	Items/ Performers
127		Heart
128		Heaven and Hell
129		Hilary Duff
130		HIM
131		Hinder
132		Hinder, Papa Roach, Buckcherry, Revelation Theory
133		Hippiefest
134		Il Divo
135		Imogen Heap


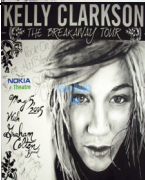
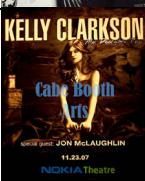




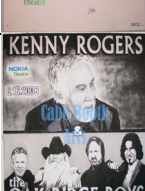





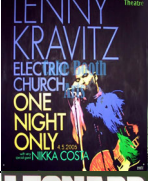






Ref	Picture	Items/ Performers
136		India Arie
137		Interpol
138		INXS
139		Jack Johnson
140		Jackson Browne, Steve Earle, Keb' Mo'
141		Jaime Foxx
142		Jaime Foxx
143		Jamarama
144		James Blunt

Ref	Picture	Items/ Performers
145	 A poster for the James Gang band. It features the band members and the text "James Gang", "rides again", and "Jimmy Fox, Dale Peters & Joe Walsh".	James Gang
146	 A poster for James Taylor. It features a photo of him with a guitar and the text "JAMES TAYLOR", "Cable Music Arts", and "NICKIA Theatre 4.21.2005".	James Taylor
147	 A poster for Jason Mraz. It features a photo of him and the text "JASON MRAZ & THE TAKE IT EASY BUDDIES", "NICKIA Theatre", and "7.28.05".	Jason Mraz
148	 A poster for Jeff Beck. It features a photo of him playing guitar and the text "JEFF BECK", "Cable Music Arts", and "NICKIA Theatre".	Jeff Beck
149	 A poster for Jeff Foxworthy. It features a photo of him and the text "JEFF FOXWORTHY", "Cable Music Arts", and "NICKIA Theatre".	Jeff Foxworthy
150	 A poster for Jerry Lee Lewis. It features a photo of him at a piano and the text "Jerry Lee Lewis", "March 30th 2007", and "NICKIA Theatre".	Jerry Lee Lewis
151	 A poster for Jesse McCartney. It features a photo of him and the text "Jesse McCartney", "The Essential First Tour", and "NICKIA Theatre 9.3.2005".	Jesse McCartney
152	 A poster for Jill Scott. It features a photo of her and the text "Jill Scott", "2.22.05", and "NICKIA Theatre".	Jill Scott
153	 A poster for Jim Brickman. It features a photo of him and the text "JIM BRICKMAN", "Beautiful World TOUR 2009", and "NICKIA Theatre".	Jim Brickman

Ref	Picture	Items/ Performers
154		Jingle Ball, Simple Plan, Black Eyed Peas, Hilary Duff, Jessica Simpson, Nick Lachey
155		Joe Rogan, Charlie Murphy, John Heffron
156		Joe Satriani, Chad Smith, Michael Anthony, Sammy Hagar
157		John Fogerty
158		John Fogerty
159		John Hiatt
160		John Legend
161		Johnny Lang
162		Johnny Lang





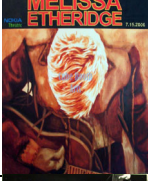




Ref	Picture	Items/ Performers
163	 A concert poster for the Jonas Brothers. It features the three brothers in a black and white photo. Text includes "Jonas Brothers", "WITH SPECIAL GUESTS", "NOKIA Theatre", "2.28.08", and "3.4.08".	Jonas Brothers
164	 A concert poster for the band Journey. It features a phoenix logo with the text "JOURNEY" above it. Text includes "NOKIA Theatre" and "9.27.03".	Journey
165	 A concert poster for the band Judas Priest. It features a dark, gothic-style image with the band's name "JUDAS PRIEST" at the bottom. Text includes "NOKIA Theatre".	Judas Priest
166	 A concert poster for Kanye West and Fantasia. It features Kanye West in a white suit. Text includes "kanYeWest", "TOUCH THE SKY TOUR", "11.26.05", "NOKIA Theatre", and "Fantasia".	Kanye West, Fantasia
167	 A concert poster for Kat Williams. It features a black and white photo of her wearing a hat. Text includes "Kat Williams" and "NOKIA Theatre".	Kat Williams
168	 A concert poster for Kat Williams. It features a black and white photo of her. Text includes "Kat Williams", "NOKIA Theatre", and "6.19.2008".	Kat Williams
169	 A concert poster for Kathy Griffin. It features a photo of her. Text includes "KATHY GRIFFIN", "LIVE", "NOKIA Theatre", and "JULY 28".	Kathy Griffin
170	 A concert poster for Katy Perry. It features a stylized image of her. Text includes "Katy Perry", "JULY 28", and "NOKIA Theatre".	Katy Perry
171	 A concert poster for the band Keane. It features a stylized image of a person. Text includes "KEANE", "re:spkts", "6.19.2008", and "NOKIA Theatre".	Keane

Ref	Picture	Items/ Performers
172		Keith Urban, Katrina Elam
173		Kelly Clarkson
174		Kelly Clarkson
175		Kelly Clarkson, Clay Aiken
176		KEM
177		Kenny Babyface Edmonds
178		Kenny Loggins, Jim Messina
179		Kenny Rogers, The Oak Ridge Boys
180		Kevin Hart







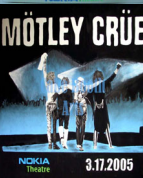


Ref	Picture	Items/ Performers
181		Killswitch Engage
182		KRN Summer Show: Charlie Wilson, Kem, Mint Condition, Leela James, Dwele, Laura Izibor, N'Dambi
183		Lenny Kravitz
184		Leonard Cohen
185		Lord of the Dance, Michael Flatley
186		Ludacris
187		Luis Miguel
188		Lynyrd Skynyrd
189		Mannheim Steamroller

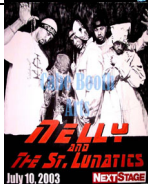
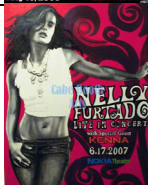





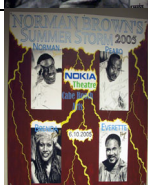
Ref	Picture	Items/ Performers
190		Margaret Cho
191		Mariah Carey
192		Mariah Carey
193		Marilyn Manson
194		Maroon5
195		Martina McBride
196		Mary J. Blige
197		Massive Attack
198		Matchbox Twenty


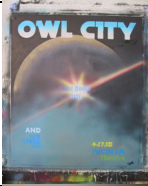


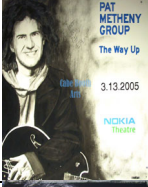



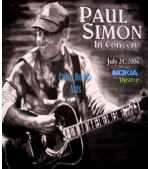


Ref	Picture	Items/ Performers
199		Matisyahu
200		Maze
201		Maze
202		Maze
203		Melissa Etheridge
204		Melissa Etheridge
205		MercyMe, Amy Grant, Bebo Norman
206		Michael Bolton
207		Michael Buble


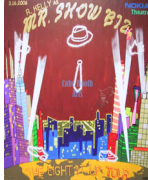
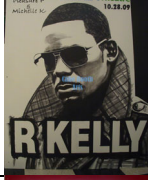

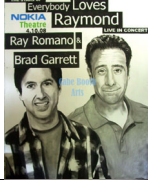





Ref	Picture	Items/ Performers
208		Michael McDonald, Boz Scaggs
209		Michael W. Smith
210		Mike Epps
211		Miranda Cosgrove
212		Modest Mouse
213		Modest Mouse
214		Motley Crue
215		Muse
216		Muse







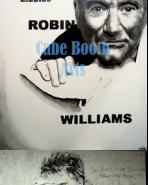
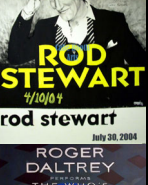

Ref	Picture	Items/ Performers
217	 A poster for My Chemical Romance featuring a clock face with the band's name in the center. The text "NICKELA Theatre" is at the top left and "9:30pm" is at the top right.	My Chemical Romance
218	 A poster for Nelly's "Nelly & The St. Lunatics" tour, featuring the band members. The text "NICKELA Theatre" is at the top left and "July 10, 2003" is at the bottom left.	Nelly
219	 A poster for Nelly Furtado's "Live Through This" tour, featuring the artist. The text "NICKELA Theatre" is at the top left and "6/17/2007" is at the bottom right.	Nelly Furtado
220	 A poster for Ne-Yo's "Masquerade" tour, featuring the artist. The text "NICKELA Theatre" is at the top left and "2-15-2009" is at the bottom left.	Ne-Yo
221	 A poster for Nick Lachey's "Nick Lachey Tour" featuring the artist. The text "NICKELA Theatre" is at the top left and "JOANNE" is at the bottom left.	Nick Lachey
222	 A poster for Nickelback's "The Plan" tour, featuring the band. The text "NICKELA Theatre" is at the top left and "10/6/03" is at the bottom left.	Nickelback
223	 A poster for Norah Jones's "Live Through This" tour, featuring the artist. The text "NICKELA Theatre" is at the top left and "7/23/03" is at the bottom right.	Norah Jones
224	 A poster for Norah Jones's "Live Through This" tour, featuring the artist. The text "NICKELA Theatre" is at the top left and "6/11/2007" is at the bottom right.	Norah Jones
225	 A poster for Norman Brown's "Norman Brown & Friends" tour, featuring the artist. The text "NICKELA Theatre" is at the top left and "2003" is at the top right.	Norman Brown, Peabo Bryson, Brenda Russell, Everette Harp

Ref	Picture	Items/ Performers
226		Olivia Newton John
227		Owl City
228		Paper Monsters
229		Pat Green
230		Pat Metheny
231		Pat Metheny
232		Patti LaBelle, Charlie Wilson
233		Paul Potts
234		Paul Simon

Ref	Picture	Items/ Performers
235	 A poster for Paulina Amanda featuring a close-up of her face with red hair and the text "PAULINA AMANDA", "Take Back the Night", "MAY 18th 2007", and "NOKIA Theatre".	Paulina Amanda
236	 A poster for Paulina Rubio featuring her face and the text "paulina rubio", "4.29.05", and "NOKIA Theatre".	Paulina Rubio
237	 A poster for Paulina Rubio featuring her in a dynamic pose with the text "PAULINA RUBIO", "GRAN CITY POP TOUR", "MAY 11th", and "NOKIA Theatre".	Paulina Rubio
238	 A poster for Pink Floyd featuring the text "THE AUSTRALIAN PINK FLOYD SHOW", "MAY 11th", and "NOKIA Theatre".	Pink Floyd
239	 A poster for Pink Floyd featuring the text "Laserspectacle", "PINK FLOYD", "1.13.2006", and "NOKIA Theatre".	Pink Floyd
240	 A poster for Pixies featuring the band's name in a stylized font, "10.19.2004", and "NOKIA Theatre".	Pixies
241	 A poster for Poison and Ratt featuring the bands' names and "MAY 8th 2007", "NOKIA Theatre".	Poison, Ratt
242	 A poster for "The Sugar Water Festival" featuring Queen Latifah, Erykah Badu, and Jill Scott, with the text "The Sugar Water Festival".	Queen Latifah, Erykah Badu, Jill Scott
243	 A poster for Queensryche featuring the band's name and "8.27.2007", "NOKIA Theatre".	Queensryche

Ref	Picture	Items/ Performers
244		Queensryche, Dream Theater
245		R. Kelly
246		R. Kelly
247		Radio City Christmas Spectacular, The Rockettes
248		Ray Romano, Brad Garrett
249		Ray Romano, Brad Garrett
250		Reba McEntire
251		Regina Spektor
252		Relient K

Ref	Picture	Items/ Performers
253		Rickey Smiley
254		Rickey Smiley
255		Ricky Martin
256		Ringo Starr
257		Ringo Starr
258		Riverdance
259		Riverdance
260		Rob Bell
261		Rob Bell

Ref	Picture	Items/ Performers
262		Rob Bell
263		Rob Thomas
264		Rob Zombie
265		Robert Plant
266		Robert Plant , Allison Krauss
267		Robin Thicke, Jennifer Hudson
268		Robin Williams
269		Rod Stewart
270		Roger Daltrey, The Who, Tommy








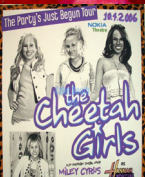



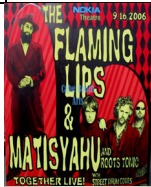

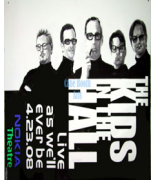


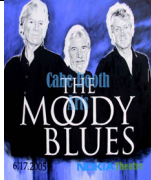



Ref	Picture	Items/ Performers
271		Ruben Studdard
272		Santana
273		Screamfest
274		Seal
275		Seal
276		Sean Hannity
277		Sesame Street Live
278		Sesame Street Live: Elmo's Coloring Book
279		Shaquille O'Neal's All Star Comedy Jam




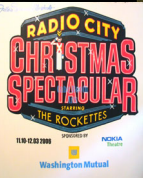







Ref	Picture	Items/ Performers
280	 A poster for Sheryl Crow's performance. It features her name 'SHERYL CROW' in large, colorful, stylized letters at the top. Below the name is a black and white photograph of her face. At the bottom, there is a date '11.03.07' and the word 'NORWICH'.	Sheryl Crow
281	 A poster for Sin Bandera's tour. It features the text 'Sin Bandera' in a stylized font at the top, followed by 'Arts' and 'SO'. Below this is 'tour • mañana' and a date '11.03.07'. At the bottom is the word 'NORWICH'.	Sin Bandera
282	 A poster for Slayer's performance. It features the band's name 'SLAYER' in a large, stylized font at the top. Below it is 'Arts' and 'SO'. Further down is 'Slayer' and a date '11.03.07'. At the bottom is the word 'NORWICH'.	Slayer
283	 A poster for Slipknot's performance. It features the band's name 'Slipknot' in a stylized font at the top. Below it is 'Arts' and 'SO'. Further down is 'Slipknot' and a date '11.03.07'. At the bottom is the word 'NORWICH'.	Slipknot
284	 A poster for Slipknot's performance. It features the band's name 'Slipknot' in a stylized font at the top. Below it is 'Arts' and 'SO'. Further down is 'Slipknot' and a date '11.03.07'. At the bottom is the word 'NORWICH'.	Slipknot
285	 A poster for Slipknot's performance. It features the band's name 'Slipknot' in a stylized font at the top. Below it is 'Arts' and 'SO'. Further down is 'Slipknot' and a date '11.03.07'. At the bottom is the word 'NORWICH'.	Slipknot
286	 A poster for Smashing Pumpkins' performance. It features the band's name 'SMASHING PUMPKINS' in a stylized font at the top. Below it is 'Arts' and 'SO'. Further down is '11.03.07' and the word 'NORWICH'.	Smashing Pumpkins
287	 A poster for Snocore's performance. It features the text 'SEETHER SHINEDOWN WITH FLYLEAF' at the top. Below this is 'Winterfresh' and 'SNO CORE 2006 TOUR'. At the bottom is the date '11.03.07' and the word 'NORWICH'.	Snocore
288	 A poster for Snow Patrol's performance. It features the band's name 'SNOW PATROL' in a stylized font at the top. Below it is a silhouette of a person and the word 'go'. At the bottom is the date '11.03.07' and the word 'NORWICH'.	Snow Patrol


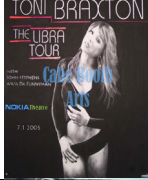

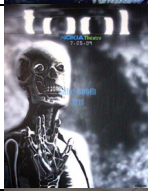
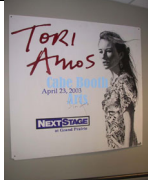


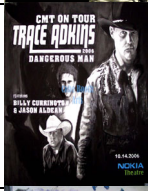
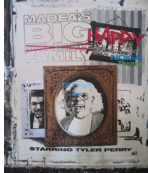
Ref	Picture	Items/ Performers
289	 A concert poster for Soundgarden and Mastodon. It features a dark, atmospheric image with green lightning bolts. Text includes "SOUNDGARDEN", "MASTODON", and "OCTOBER 26 VERIZON THEATRE".	Soundgarden
290	 A concert poster for Spinal Tap. It features three men's faces in a row. Text includes "Spinal Tap", "UNWINDING", "CHRISTOPHER GUEST MICHAEL MCKEAN & HARRY SHEARER", "MAY 2ND 2007", and "NOKIA Theatre".	Spinal Tap, Christopher Guest, Michael McKean, Harry Shearer
291	 A concert poster for Steely Dan and Michael McDonald. It features a black and white photo of the two artists. Text includes "Steely Dan", "Michael McDonald", and "NOKIA Theatre".	Steely Dan, Michael McDonald
292	 A concert poster for Steve Nicks. It features a woman in a dark dress. Text includes "STEVE NICKS", "VANESSA CARLTON", "JULY 17, 2008", and "NOKIA Theatre".	Steve Nicks
293	 A concert poster for Stevie Wonder. It features a portrait of Stevie Wonder wearing sunglasses. Text includes "STEVIE WONDER", "19.5.07", and "NOKIA Theatre".	Stevie Wonder
294	 A concert poster for Sting. It features a photo of Sting playing guitar. Text includes "Sting", "1/31/2004", and "NOKIA Theatre".	Sting
295	 A concert poster for Sting's "Back in the Saddle Tour". It features a photo of Sting on a horse. Text includes "STING", "BACK IN THE SADDLE TOUR", "NOV 16", and "VERIZON THEATRE".	Sting
296	 A concert poster for Stone Temple Pilots. It features a red and black design with the band's name. Text includes "STONE TEMPLE PILOTS", "with special guest BLACK FRANCES", and "JUNE 23RD 2005 NOKIA Theatre".	Stone Temple Pilots
297	 A concert poster for Taking Back Sunday. It features a colorful, abstract design. Text includes "TAKING BACK SUNDAY", "ANGELS & AIRWAVES", and "NOKIA Theatre".	Taking Back Sunday

Ref	Picture	Items/ Performers
298		Taste of Chaos
299		Taste of Chaos, Deftones, Thrice, Atreyu, Funeral For A Friend, As I Lay Dying, Story Of The Year
300		Taylor Hicks
301		The All-American Rejects
302		The Beach Boys
303		The Beach Boys
304		The Black Crowes
305		The Cheetah Girls, Miley Cyrus
306		The Eagles, Glen Frey, Don Henley, Joe Walsh

Ref	Picture	Items/ Performers
307		The Flaming Lips
308		The Isley Brothers
309		The Kids In The Hall
310		The Killers
311		The Killers
312		The Moody Blues
313		The Music of Led Zeppelin, The Fort Worth Symphony Orchestra
314		The New Cars, Blondie
315		The O'Jays

Ref	Picture	Items/ Performers
316		The Polyphonic Spree
317		The Polyphonic Spree
318		The Raconteurs
319		The Rockettes
320		The Smothers Brothers
321		The Strokes
322		The Strokes
323		The Ten Tenors
324		The Ultimate Doo Wop Show


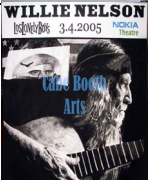


Ref	Picture	Items/ Performers
325		The White Stripes
326		The Wiggles
327		The Wiggles
328		The Wiggles
329		The Wiggles
330		Third Day
331		Toby Mac
332		Tom Jones
333		Tom Jones

Ref	Picture	Items/ Performers
334		Tommy Lee, Gilby Clarke, Johnny Colt, Lukas Rossi
335		Toni Braxton
336		Tony Toni Tone, Blackstreet, SWV, Guy
337		Tool
338		Tori Amos
339		Tori Amos
340		Tori Amos
341		Trace Adkins, Billy Currington, Jason Aldean
342		Tyler Perry



Ref	Picture	Items/ Performers
343	 A poster for Van Morrison's live performance. It features a black and white photo of Van Morrison wearing a hat. Text includes "VAN MORRISON LIVE", "3/6/2006", and "NOKIA Theatre".	Van Morrison
344	 A colorful poster for VeggieTales Live! featuring the characters Larry the Cucumber, Bob the Tomato, and others. Text includes "VeggieTales LIVE!", "NOKIA Theatre", and "8.18.05".	Veggie Tales
345	 A poster for Wanda Sykes' live performance. It features a photo of Wanda Sykes. Text includes "Wanda Sykes LIVE!", "Cabe Booth Presents", "JUNE 22nd 2006", and "NOKIA Theatre".	Wanda Sykes
346	 A poster for Wayne Newton's performance. It features a photo of Wayne Newton in a tuxedo. Text includes "Wayne Newton", "MARCH 7, 2007", and "NOKIA Theatre".	Wayne Newton
347	 A poster for Weird Al Yankovic's live concert. It features a photo of Weird Al Yankovic. Text includes "Cabe Booth LIVE IN CONCERT! WEIRD AL YANKOVIC", "THE STRAIGHT OUTTA CANTON", "8.6.8", and "NOKIA Theatre".	Weird Al Yankovic
348	 A poster for the game show Wheel of Fortune. It features the show's logo and a photo of Pat Sajak and Vanna White. Text includes "NOKIA Theatre", "MARCH 22nd 2006", and "WHEEL OF FORTUNE".	Wheel of Fortune, Pat Sayjack, Vanna White
349	 A poster for Widespread Panic's performance. It features the band's name in a stylized font over a green background with silhouettes of people. Text includes "4.30.05", "NOKIA Theatre", and "WIDESPREAD PANIC".	Widespread Panic
350	 A poster for Widespread Panic's performance. It features a white bird flying over a blue background. Text includes "WIDESPREAD PANIC", "7.28.2006", and "NOKIA Theatre".	Widespread Panic
351	 A poster for Widespread Panic's performance. It features a woman's face surrounded by colorful flowers. Text includes "SATURDAY MARCH 24", "NOKIA Theatre", "2007 TOUR", and "WIDESPREAD PANIC".	Widespread Panic



Ref	Picture	Items/ Performers
352		Widespread Panic
353		Willie Nelson
354		Yanni
355		Zac Brown Band